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**MEMO ENDORSED**

April 13, 2020

**By ECF**

Honorable Valerie E. Caproni  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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**Re: *United States v. Patrick Avila, et al.*  
19 Cr. 166 (VEC)**

Dear Judge Caproni:

I represent Patrick Avila in the above-captioned matter. I write to respectfully request an adjournment of forty-five days for Mr. Avila's sentencing, now scheduled for May 1 2020, at 2:00 PM. This application is made with the consent of the government.

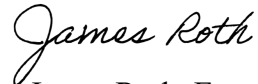
The travel restrictions imposed on counsel due to the COVID-19 pandemic have prevented substantive lawyer-client communications with Mr. Avila who is confined to Westchester Correctional Center. Although, when possible, I have communicated with him through video conferencing, the time is limited and not conducive to the review of legal documents in a privileged setting. Furthermore, although Mr. Avila is eager to compose a letter to Your Honor in advance of his sentence, he has essentially been gripped in fear of contracting the virus which is raging in the prison facility. He is housed in an open dorm setting which was just last week locked down.

For all these reasons and with the expectation that the noted restrictions will be removed in the next 30 days, I respectfully request that the sentence and briefing schedule be adjourned.

Wherefore, with consent from the government, counsel respectfully requests a forty-five day adjournment of Mr. Avila's sentencing at a date and time convenient to the Court.

STAMPUR & ROTH

Very truly yours,

  
James Roth, Esq.

cc: AUSA Jamie Bagliebter (By ECF)

Application GRANTED. Mr. Avila's sentencing is adjourned to **June 19, 2020, at 3:00 p.m.** The parties' sentencing submissions are due not later than **June 5, 2020.**

SO ORDERED.

  
4/13/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE